

1 Erich P. Wise/State Bar No. 63219
2 Aleksandrs E. Drumalds/State Bar No. 237101
3 FLYNN, DELICH & WISE LLP
4 One World Trade Center, Suite 1800
Long Beach, California 90831-1800
Telephone: (562) 435-2626
Facsimile: (562) 437-7555

5 James B. Nebel/State Bar No. 69626
6 Conte C. Cicala/State Bar No. 173554
FLYNN, DELICH & WISE LLP
7 One California Street, Suite 350
San Francisco, California
8 Telephone: (415) 693-5566
Facsimile: (415) 693-0410

9 Attorneys for Defendant
HANJIN SHIPPING CO., LTD.

UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF CALIFORNIA

14 Chelsea, LLC, Mark Russo, and Allen
15 Loretz, individually and on behalf of
all others similarly situated,

20 Regal Stone, Ltd., Hanjin Shipping
21 Co., Ltd., Synergy Maritime, Ltd.,
22 Fleet Management, Ltd., and John
23 Cota, *In Personam*; M/V Cosco
24 Busan, their engine, tackle,
equipment, appurtenances, freights,
and cargo, *In Rem*,

Defendants

1 **TO THE COURT AND ALL COUNSEL OF RECORD:**

2 **IT IS HEREBY STIPULATED** by and between plaintiffs CHELSEA,
 3 LLC, MARK RUSSO, and ALLEN LORETZ (“Plaintiffs”) and defendant
 4 HANJIN SHIPPING CO., LTD, (“Hanjin”), through their respective counsel of
 5 record, that the time for Hanjin to file and serve a response to Plaintiffs’ Verified
 6 Second Amended Class Action Complaint is extended by twenty-one (21) days.
 7 Defendant Hanjin will file and serve its response to Plaintiffs’ Verified Second
 8 Amended Class Action Complaint no later than Friday, August 29, 2008.

9 This stipulation is not entered into for purposes of delay, but to permit
 10 defendant Hanjin to continue its investigation, to address the new allegations
 11 contained in Plaintiffs’ Verified Second Amended Class Action Complaint, and
 12 to allow defendant Hanjin to formulate a proper response.

13 **IT IS SO STIPULATED AND AGREED.**

14 Dated: August 4, 2008

15 AUDET & PARTNERS, LLP

16 By: /s/ William M. Audet (as authorized on 8/4/08)

17 William M. Audet
 18 Attorney for Plaintiff
 19 CHELSEA, LLC, MARK RUSSO, and
 20 ALLEN LORETZ

21 Dated: August 4, 2008

22 FLYNN, DELICH & WISE LLP

23 By: /s/ Erich P. Wise

24 Erich P. Wise
 25 Attorney for Defendant
 26 HANJIN SHIPPING CO., LTD

O R D E R

Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the time for defendant HANJIN SHIPPING CO., LTD to file and serve a response to the Verified Second Amended Class Action Complaint of plaintiffs CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ is extended by twenty-one (21) days. Defendant is ordered to file and serve its response to Plaintiffs' Verified Second Amended Class Action Complaint no later than Friday, August 29, 2008.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

**HON. SAMUEL CONTI
UNITED STATES DISTRICT JUDGE**